IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

CAITLIN O'CONNOR,)
Plaintiff,) No. 3:20-cv-00628
v.) Judge Eli J. Richardson)
THE LAMPO GROUP, LLC a/k/a RAMSEY SOLUTIONS,)) Magistrate Judge Frensley) Jury Demand
Defendant.)

UNOPPOSED MOTION TO AMEND CASE MANAGEMENT ORDER

Plaintiff moves to amend the case management order (ECF 12) and extend the following deadlines. For good cause shown, the Parties encountered a discovery dispute which required assistance from the Court and which has and will impact Plaintiff's ability to conduct discovery and meet corresponding deadlines. As a result, depositions that were initially requested for the March /April timeframe are being re-scheduled and additional written discovery is taking place, which now conflicts with Plaintiff's counsel's trial schedule. Plaintiff conferred with Defendant about this motion who does not oppose the motion. Accordingly, Plaintiff requests the following deadlines be extended/modified:

- Initial Deadline to file a joint settlement report on or before **July 14, 2021**. Plaintiff is requesting this date be moved to **September 17, 2021**.
- Initial Deadline to complete all written discovery and depose all fact witnesses on or before June 30, 2021. Plaintiff is requesting this date be moved to September 3, 2021.
- Initial Deadline to file discovery motions by no later than July 14, 2021. Plaintiff

is requesting this date be moved to **September 17, 2021**.

- Initial Deadline to file all Motions to Amend on or before February 5, 2021.
 Plaintiff is requesting this date be moved to June 30, 2021.
- Initial Deadline for Plaintiff to identify and disclose all expert witnesses and expert reports on or before May 30, 2021, and defendant to identify and disclose all expert witnesses and reports on or before June 27, 2021. Expert depositions shall be completed by September 30, 2021. Plaintiff is requesting these dates be moved to June 18, 2021 for Plaintiff's Expert Disclosures, and August 6, 2021 for Defendant's Expert Disclosures, and depositions completed by September 30, 2021.

This motion will not affect the trial date of April 5, 2022, or dispositive motion deadline of October 22, 2021.

Respectfully submitted,

s/ Heather Moore Collins

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CERTIFICATE OF SERVICE

I HEREBY certify that a copy of the foregoing has been e-mailed this the 24th day of March 2021 to counsel of record through the court's CM/ECF system:

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<u>/s/ Heather Moore Collins</u> <u>Attorney for Plaintiff</u>